

EXHIBIT G

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, JULIEANNA)
MUNIZ, ELIZA CAMBAY, SAL) Case No.:
CATALDO, EMIR GOENAGA, JULIAN) 3:20-cv-04688
SANTIAGO, HAROLD NYANJOM, KELLIE)
NYANJOM, and SUSAN LYNN HARVEY,)
individually and on behalf of all)
others similarly situated,)
Plaintiffs,)
vs.)
GOOGLE LLC,)
Defendant.)

-----)

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

REMOTE PROCEEDINGS OF THE
VIDEOTAPED DEPOSITION OF STEVE GANEM
FRIDAY, OCTOBER 28, 2022

REPORTED BY NANCY J. MARTIN
CSR. NO. 9504, RMR, RPR
CLAUDIA R. GARCIA, CSR. 12812
JOB No. 5554575

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1 retention period for the IID for Android users.

2 BY MR. MAO:

3 Q Sorry. Can you explain that a little bit
4 more?

5 [REDACTED] 08:12:48

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED].

10 Q And -- and that was in response to this 08:13:19
11 e-mail?

12 A I'm sorry?

13 Q Was that done in response to this e-mail?

14 A Not in response to this e-mail. These are
15 working groups that meet and discuss projects and 08:13:35
16 ensure that we do the right thing. So as part of the
17 review of the design, there were some improvements that
18 were made to, from the privacy working group's
19 perspective, improve the privacy factors here.

20 And another thing I want to really highlight 08:14:00
21 here is, they're talking about joinability risks.
22 There is no joinability. Like there is no intention
23 to. There's no use case for. There is no joining of
24 the IID or the FID with GAIA anywhere.

25 In Analytics, there's no ability to join these 08:14:18

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1 two. [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 So really, what they're talking about here is
5 the theoretical joinability, even -- we go so far as to 08:14:33
6 prevent even the theoretical.

7 There are more measures we take, such as
8 making sure that only Analytics engineers have access
9 to this data. And as I mentioned, within Analytics,
10 there's no ability to join this IID with GAIA. 08:14:50

11 Q I put in to -- Exhibit 234, which should be
12 a -- oh, I'm so sorry. Can you pull up 233 instead.

13 (Exhibit 233 was marked for
14 identification and is attached
15 hereto.) 08:15:14

16 A Okay. I'm waiting for it to come in.

17 233?

18 Q Yeah. And I'm really actually only asking you
19 about one thing from here, which is going to be on --

20 A Which exhibit? I'm sorry. 08:15:48

21 Q 233.

22 A Okay.

23 Q And I'm really focusing on the log list on
24 page 3. And my first question to you is going to be
25 whether or not you're familiar with these logs? 08:16:07

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C E R T I F I C A T E

I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify;

That the foregoing proceedings were taken before me stenographically at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were administered an oath; that a record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; that the foregoing transcript is a true record of the testimony given.

Further, that if the foregoing pertains to the original transcript of a deposition in a Federal Case, before completion of the proceedings, review of the transcript [] was [] was not requested.

I further certify I am neither financially interested in the action nor a relative or employee or any attorney or any party to this action.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: November 22, 2022

A handwritten signature in cursive script, appearing to read "CR Garcia", is written over a horizontal line.

CLAUDIA R. GARCIA, CSR. 12812